

In the matter of)	RM-10782, RM-10783, RM-10784,
Telegraphy Examination)	RM-10785, RM-10786, RM-10487
Requirements in the)	
Amateur Radio Service)	

COMMENTS by Donald B. Chester, K4KYV

To: The Commission

I believe it is in the public interest to maintain a reserve pool of trained operators with the ability to communicate by manual Morse code. Although the use of Morse has declined in recent years, it remains a viable back-up to today's more sophisticated communication systems. Morse is still widely used in the amateur service, and scanning the hf spectrum will reveal numerous cw signals still in regular operation outside the amateur bands.

Although the majority of amateur licensees may have begun as reluctant students of Morse telegraphy who learned the code primarily to meet licensing requirements, a large number of amateur operators found cw operation enjoyable and have continued to use the mode in their amateur operation. Most likely, very few licensed amateurs would have studied Morse if it had not been an examination requirement. Consequently, if the Morse requirement is eliminated, rarely will newly licensed amateurs learn the code and become proficient at cw. As the current generation of code-proficient operators disappears due to natural attrition, the art of Morse communication will be lost.

The present code speed requirement of 5 words per minute is not a significant obstacle to any motivated person with the desire to become a licensed amateur. In years past, the higher examination speeds did keep amateur radio beyond the reach of many would-be licensees. In 1951, the Commission created the Novice class entry-level licence with a 5 w.p.m. speed requirement. This opened the gates to many persons who otherwise would never have attempted the amateur examination, and with on-the-air practice as Novices, the higher speeds came to most people with relatively little effort. The present 5 w.p.m. examination requirement retains the "Novice" code requirement and, while much less difficult than the previous 13 w.p.m. speed, nevertheless equips the licensee with a basic knowledge of the Morse alphabet and ability to decipher the Morse characters by ear. It is up to the individual, once licensed, to advance his/her Morse operating skills to a useful communication speed if (s)he so desires, or to simply allow them to lapse from lack of use. Even if only a small percentage of newcomers to amateur radio choose to become proficient at Morse, this will retain a reserve pool of citizens with the skill to communicate by Morse. With the de-emphasis of Morse code in other communications services, amateur radio has essentially become the only means of keeping the art of Morse communication alive.

The amateur Morse requirement is analogous to requirements in our public education system. It could be argued that high school courses in algebra, geometry, physics, chemistry and foreign languages should be eliminated, since the vast majority of

graduates will not continue their studies to become mathematicians, scientists or linguists, and could pursue their life goals armed only with the skills of reading, writing and basic arithmetic. But without those course requirements, very few of the small minority of graduates who do choose those special professions would have been motivated to acquire the necessary entry-level skills.

I believe it would be in the public interest to retain the existing minimal Morse code requirements for amateur licensing in order to preserve a pool of individuals skilled in Morse communication. A more appropriate response to the present de-emphasis of Morse code in amateur radio communication would be to alter the current subband restrictions, especially on the 3.5 MHz. band, that have resulted in vast expanses of underutilised spectrum lying adjacent to segments congested to the point of limited use.

In summary, I respectfully urge the Commission to retain the current Morse code requirements for amateur radio examinations, but to carefully examine the present subband structure and allocations.

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